1 THE HONORABLE JAMES L. ROBART 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9. WESTERN DISTRICT OF WASHINGTON 10 Case No. 2:17-cv-01741-JLR BRETT CALDWELL, an individual, 11 STIPULATED MOTION FOR Plaintiff. EXTENSION OF TIME TO RESPOND 12 TO THIRD AMENDED COMPLAINT AND PROPOSED ORDER THE BOEING COMPANY, a Delaware 13 Corporation and DOES 1-10; **NOTING DATE: MAY 31, 2018** 14 Defendants. 15 16 The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to extend 17 18 19

the deadline for Defendant The Boeing Company ("Boeing") to file its Response to Plaintiff's Third Amended Complaint, which was filed on May 22, 2018. (Dkt. No. 32). In the absence of an Order extending the deadline to respond to Plaintiff's Complaint, Defendant Boeing's response must be filed by no later than June 5, 2018.

The Parties now agree to extend by two weeks Defendant's time to answer, move, or otherwise respond to the Third Amended Complaint to provide time for Defendant's counsel to prepare an appropriate response to the Third Amended Complaint. Plaintiff's counsel consented to the requested extension. The Parties therefore join in asking the Court to extend by two weeks the deadline for Defendant to respond to the Third Amended Complaint until June 19, 2018.

STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO THIRD AMENDED COMPLAINT AND PROPOSED ORDER - 1

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2	DATED this 31st day of May 2018:	
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9 10 11 12 13	Steven H. Haney, admitted pro hac vice Gregory L. Young, admitted pro hac vice 1055 West Seventh Street, Suite 1950 Los Angeles, CA 90017 Phone: (213) 228-6500 Fax: (213) 228-6501 Attorneys for Plaintiff BRETT CALDWELL	MORGAN, LEWIS & BOCKIUS LLP Lincoln O. Bisbee, admitted pro hac vice P. David Larson, admitted pro hac vice 1111 Pennsylvania Avenue NW Washington, D.C. 20004 Phone: (202) 739-3000 Fax: (202) 739-3001 Email: lincoln.bisbee@morganlewis.com Email: david.larson@morganlewis.com
15 16 17		Attorneys for Defendant THE BOEING COMPANY
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STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO THIRD AMENDED COMPLAINT AND [PROPOSEIS] ORDER - 2

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1 PROPOSED | ORDER Pursuant to the stipulated motion of the parties as set forth above, IT IS HEREBY ORDERED 2 that the motion is GRANTED, and IT IS HEREBY ORDERED that the deadline for Defendant to 3 answer, move, or otherwise respond to Plaintiff's Third Amended Complaint is extended to June 19. 4 2018. 5 IT IS SO ORDERED this _\St_ day of _ 2018. 6 7 8 THE HONORABLE JAMES L. ROBART United States District Judge 9 10 *Presented by:* 11 WEISS LAW FIRM, PLLC OGLETREE, DEAKINS, NASH, SMOAK 12 & STEWART, P.C. /s/ Reba Weiss By: 13 By: /s/Laurence A. Shapero Reba Weiss, WSBA #12876 14 12537 15th Ave NE Suite 108 Laurence A. Shapero, WSBA #31301 Seattle, WA 98125-3979 800 Fifth Avenue, Suite 4100 15 Phone: (206) 508-5933 Seattle, WA 98104 reba@weisslawfirm.org Phone: (206) 693-7057 16 Fax: (206) 693-7058 HANEY & YOUNG LLP Email: laurence.shapero@ogletree.com 17 Steven H. Haney, admitted pro hac vice MORGAN, LEWIS & BOCKIUS LLP 18 Gregory L. Young, admitted pro hac vice 1055 West Seventh Street, Suite 1950 Lincoln O. Bisbee, admitted pro hac vice 19 Los Angeles, CA 90017 P. David Larson, admitted pro hac vice Phone: (213) 228-6500 1111 Pennsylvania Avenue NW 20 Washington, D.C. 20004 Fax: (213) 228-6501 Phone: (202) 739-3000 21 Fax: (202) 739-3001 Attorneys for Plaintiff BRETT CALDWELL Email: lincoln.bisbee@morganlewis.com 22 Email: david.larson@morganlewis.com 23 Attorneys for Defendant 24 THE BOEING COMPANY 25 26 STIPULATED MOTION FOR EXTENSION OF TIME Morgan, Lewis & Bockius LLP 1111 Pennsylvania Avenue, N.W. Washington, DC 20004 +1.202.739.3000 TO RESPOND TO THIRD AMENDED COMPLAINT

AND [PROPOSED] ORDER - 3

CERTIFICATE OF SERVICE 1 I hereby certify that on May 31, 2018, I electronically filed the foregoing with the Clerk of the 2 3 Court using the Court's CM/ECF system, which caused a true and correct copy of the foregoing to be served upon: 4 5 Reba Weiss, WSBA #12876 6 WEISS LAW FIRM, PLLC 12537 15th Ave NE Suite 108 7 Seattle, WA 98125-3979 Phone: (206) 508-5933 8 reba@weisslawfirm.org 9 Steven H. Haney 10 Gregory L. Young HANEY & YOUNG LLP 11 1055 West Seventh Street, Suite 1950 Los Angeles, CA 90017 12 Phone: (213) 228-6500 13 Fax: (213) 228-6501 shaney@haneyyoung.com 14 gyoung@haneyyoung.com 15 Attorneys for Plaintiff Brett Caldwell 16 17 /s/ P. David Larson P. David Larson, admitted pro hac vice 18 MORGAN, LEWIS & BOCKIUS LLP 1111 Pennsylvania Avenue NW 19 Washington, D.C. 20004 Phone: (202) 739-3000 20 Fax: (202) 739-3001 Email: david.larson@morganlewis.com 21 22 Attorney for Defendant The Boeing Company 23 24 25 26 STIPULATED MOTION FOR EXTENSION OF TIME Morgan, Lewis & Bockius LLP 1111 Pennsylvania Avenue, N.W. Washington, DC 20004 +1.202.739.3000 TO RESPOND TO THIRD AMENDED COMPLAINT

AND [PROPOSED] ORDER - 4